



October 20, 2011

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 10-90; GN Docket No. 09-51; WC Docket
No. 07-135; WC Docket No. 05-337; CC Docket No. 01-92;
CC Docket No. 96-45; WC Docket No. 04-36

Dear Ms. Dortch:

On Monday, October 17, 2011, Walter McCormick and I, representing USTelecom, met with Commissioner Copps and his legal advisor, Margaret McCarthy. We pointed out that the Commission's broadband deployment goals depend on Universal Service Fund reform that presents a credible financial opportunity to build and operate broadband networks in the rural, high-cost areas of our country. We discussed the particular challenges of building and operating broadband and legacy networks in these challenging locations. We also pointed out that a careful and managed transition of intercarrier compensation revenues is an essential component of any credible plan. In particular, we discussed the possibility of higher consumer flat-rated charges with the benefits of reduced per minute usage charges. We also discussed how the Consensus Framework and ABC Plan filed in these dockets created a careful transition from intercarrier compensation revenues and a clear path to vibrant broadband buildout in rural areas. Alterations to the path forward outlined in those filings must be carefully calibrated to balance any increased costs or obligations with additional revenues.

Pursuant to Commission rules, please include a copy of this filing in each of the above-referenced dockets.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Banks".

Jonathan Banks

c: Margaret McCarthy